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DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000

November 7, 2002

CERTIFIED MAIL

7001 1940 0000 8889 9057

Ms. Susan Roth
6236 27th Avenue NE
Seattle, WA 98115-7114

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FILE COPY

Dear Ms. Roth:

RE: Proposal for Changes to the Ground Water Monitoring Program;
Comments on The Piezometer Installation Report and Downgradient Monitoring Well
Installation Report for: Terminal 91 Tank Farm Site
Agreed Order No. DE 98HW-N108

The proposed *Changes to the Ground Water Monitoring Program*, prepared for the Terminal 91 Site PLP Group (PLP Group) by Roth Consulting, was received by the Department of Ecology (Ecology) on October 7, 2002. This proposal addresses the portion of the Port of Seattle (POS) Terminal-91 facility where RCRA corrective action is being performed pursuant to the Model Toxics Control Act (MTCA) Agreed Order No. DE 98HW-N108. Ecology is approving the changes requested.

Ecology **approval** of the *Proposal for Changes to the Ground Water Monitoring Program* is based on the following:

1. Since it is unclear whether or not there is significant tidal influence at the site (the PLP's Tidal study has not yet been received or reviewed), Ecology requests that monitoring wells/piezometers GP01 through GP-07 be the first locations monitored on an incoming tide and the last to be monitored on an outgoing tide. Such monitoring will help determine the nature of tidal influence and help establish values for groundwater gradients throughout the site (to the marine water).
2. Ecology requests that during the sampling of monitoring wells/piezometers GP01 through GP07 for chemical analysis, the PLP Group record the elevation of the sampling point in relation to the elevation of the water table. Samples should be collected as close to the top of the water table as practicable.
3. Additional changes may be necessary at a later date due to issues that have not yet been identified, or data evaluations that affect current assumptions.

The Piezometer Installation Report, prepared for the PLP Group by Roth Consulting, was received by Ecology on March 13, 2002.

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The Downgradient Well Installation Report, prepared for the PLP Group by Roth Consulting, was received by Ecology on September 10, 2002. Ecology's comments follow:

- Comment #1: The September 2002 report calls these wells "Downgradient Wells". Ecology's copy of the letter proposing changes to the groundwater monitoring program (received on 10/7/02) calls these wells "Upland Wells". Why are the well names being changed from *Downgradient* to *Upland*?
- Comment #2: The document provides analytical results from soil samples collected during the Piezometer Installation field work conducted in February and May 2001. In the future, if you plan to include data from another report, could you please reference that report in the text of the report for consistency.
- Comment #3: Groundwater (GW) to Surface water (SW) pathway. The text states that soil sampling data were not compared to MTCA soil cleanup levels because the pathway of concern is groundwater to surface water. Although this report deals primarily with groundwater, the PLPs should realize that Ecology has yet to conclude that the RI/FS can be solely focused on impacts to SW. Ecology understands that the PLPs are in the process of attempting to eliminate additional exposure pathways through various studies. Although such screening assessments may eventually narrow our concerns to only the GW-to-SW pathway, it is premature to assume this will be the case at this juncture of the investigation.

In fact, even if the GW-to-SW pathway is the only pathway of concern at Terminal 91, site soil concentrations should still be compared to calculated levels, consistent with MTCA, that are protective of GW (which then migrates and discharges to SW).

Thank you for your submittals. If you have any questions or comments, please contact me at the Department of Ecology Northwest Regional Office by phone at (425) 649-7280 or by email at gtri461@ecy.wa.gov.

Sincerely,



Galen H. Tritt
Hazardous Waste and Toxics Reduction Program

GHT:ct

cc: Julie Sellick, Ecology-NWRO
Ed Jones, Ecology-NWRO
Michael Kuntz, Ecology-HQ-TCP
Jan Palumbo, EPA Region 10
HZW File 6.2